

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**VOLKSWAGEN GROUP OF AMERICA, INC.,**

**Plaintiff,**

**v.**

**Civil Action No. 1:19-cv-01574**

**THE UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

**Defendants.**

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL AND/OR REDACTED  
DOCUMENTS FOR GOOD CAUSE**

Pursuant to Local Civil Rule 5, Plaintiff Volkswagen Group of America, Inc., by counsel, hereby moves for leave to file a redacted version of the following documents and/or temporarily file the following documents under seal: (1) Schedule A to the Complaint, which includes a list of eBay account names used by Defendants; (2) Exhibit 5 to the Complaint, which contains screenshots of Defendants’ Internet Store listings; (3) Exhibit 6 to the Complaint, which contains screenshots of Defendants’ Internet Store payment pages; and (4) Plaintiff’s memorandum of law in support of its *ex parte* motion for a temporary restraining order including temporary asset restraint and expedited discovery. Sealing this portion of the file is necessary to prevent Defendants from learning of these proceedings prior to the execution of the temporary restraining order. Once the temporarily restraining order has been served on the relevant parties and the requested actions taken, Plaintiff will move to unseal these documents. In support of its motion, Plaintiff relies on its Memorandum in Support and the Proposed Order filed herewith.

Date: December 13, 2019

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)

Daniel E. Yonan (VSB No. 46019)

Nicholas J. Nowak (*pro hac pending*)

Daniel S. Block (*pro hac pending*)

STERNE KESSLER GOLDSTEIN & FOX, PLLC

1100 New York Ave., N.W., Suite 600

Washington, DC 20005-3934

Telephone No.: (202) 371-2600

Facsimile No.: (202) 371-2540

mtalley@sternekessler.com

dyanan@sternekessler.com

nnowak@sternekessler.com

dblock@sternekessler.com

*Attorneys for Plaintiff*

14105697.1